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9 *Real Estate Services, LLC; Joe Anderson; and  
Mortgage Electronic Registration Systems, Inc.*

13 SILVIA REGINA LASKO, IMAM KEITH  
14 ALAN LASKO, MOSQUE OF THE  
GOLDEN RULE, and WORLDWIDE  
MINISTRIES OF ISLAM.

16 v. Plaintiffs,  
17 CALIBER HOME LOANS, INC., et al.  
18 Defendants.

Case No.: 2:18-cv-01802-JCM-VCF

**JOINT MOTION FOR EXTENSION  
OF TIME TO RESPOND TO  
PLAINTIFFS' MOTIONS FOR  
RECONSIDERATION (ECF NOS. 68  
& 69)**

20 Pursuant to LR 7-1, Defendants U.S. Bank, N.A., as Trustee for LSF9 Master  
21 Participation Trust (“U.S. Bank”), Caliber Home Loans, Inc. (“Caliber”), Summit Real  
22 Estate Services, LLC (“Summit”)<sup>1</sup>, Joe Anderson, and Mortgage Electronic  
23 Registration Systems, Inc. (“MERS”), Bank of America, N.A. (“BANA”), HSBC Finance  
24 Corporation (“HSBC”) and Ocwen Financial Corporation (“Ocwen,” collectively, the  
25 “Defendants”), by and through their attorney, and hereby move the Court, pursuant  
26 to Rule 6 of the Federal Rules of Civil Procedure, for an extension of time to respond  
27 to Plaintiffs’ Motion for Reconsideration Regarding Countrywide Home Loans and

<sup>1</sup> Incorrectly named Summit Financial Corp.

1 Acts of Perjury and of Fraud Upon the Court Committed by Bank of America (ECF  
2 No. 68) and Plaintiffs' Motion for Reconsideration Regarding Default Entry and  
3 Default Judgment Against Each of These: HSBC, OCWEN Financial Corp., Caliber  
4 Home Loans, Inc. (ECF No. 69) (collectively referred to as the "Motions for  
5 Reconsideration"). In support of this Joint Motion, Defendants state as follows:

6 1. Plaintiffs filed the Motions for Reconsideration on November 27, 2018.  
7 (ECF Nos. 68 and 69). Defendants' responsive briefs are due on or before December  
8 11, 2018.

9 2. Defendants need additional time to respond to Plaintiffs' Motions for  
10 Reconsideration. The time within which to respond has not expired.

11 3. Defendants request an additional seven (7) days to respond to Plaintiffs'  
12 Motions for Reconsiderations (ECF Nos. 68 and 69), up to and including December  
13 18, 2018, in order to accommodate the upcoming holiday schedule, the schedule of  
14 counsel and to provide the Defendants sufficient time to review and assess Plaintiffs'  
15 Motions for Reconsiderations, including all supporting documentation (ECF Nos. 68  
16 and 69).

17 4. This joint motion is not made for the purpose of delay, and it will not  
18 prejudice the parties. The relief requested will not affect any other litigation  
19 deadlines in this case.

20 **MEMORANDUM**

21 Rule 6(b) of the Federal Rules of Civil Procedure provides that the Court may  
22 grant extensions of time at any time in its discretion for good cause shown. Where,  
23 as here, the request for extension is made prior to the expiration of the specified  
24 period of time, no finding of excusable neglect is required. Defendants respectfully  
25 submit that good cause has been shown above for an extension of time.

26 For the foregoing reasons and authorities, Defendants respectfully request  
27 that the Court grant this motion and extend Defendants' deadline to respond to  
28

1 Plaintiffs' Motions for Reconsideration until December 18, 2018.

2 DATED this 4<sup>th</sup> day of December, 2018.

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23 **IT IS SO ORDERED.**



24  
25 **UNITED STATES MAGISTRATE JUDGE**  
26 **DATED: 12-11-2018**  
27  
28

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of December 2018, a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' MOTIONS FOR RECONSIDERATION (ECF NOS. 68 & 69)**, was served on the following parties in the manner set forth below:

[XX] Via the Court's CM/ECF electronic service:

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